

Exhibit B

Mishcon de Reya

Our Ref: JLL/KND/ZDSS/KC/CM/40252.8

Your Ref: JK/PB/AG/28205-156

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24 May 2019

BY E-MAIL (JKELLY@CGSH.COM)

Dear Sirs

Vale S.A. v BSG Resources Limited

Claim No: CL-2019-000269

Please find enclosed, by way of service, the following documents:

1. Sealed Application Notice dated 23 May 2019;
2. Draft Order;
3. Letter to Court dated 23 May 2019;
4. Amended Order of Mr Justice Teare dated 17 April 2019 (amended on 17 May 2019);
5. Arbitration Claim Form dated 10 May 2019;
6. Second Witness Statement of Karel Norbert Daele dated 10 May 2019 and Exhibit KND2; and
7. Acknowledgment of Service.

As you will read, BSGR is making an application pursuant to CPR 62.18(9)(a) and paragraph 3 of the Order of Mr Justice Bryan dated 9 May 2019 (the "**Enforcement Order**") to set aside the Enforcement Order (the "**Application**"). The Application is made on the basis that BSGR has separately filed an application to challenge the arbitral award (which is the subject of the Enforcement Order) under sections 68 and 24 of the Arbitration Act 1996 (the "**Challenge**") and the effect of the Challenge, if successful, would be to set aside, annul or remit the award to the Tribunal.

Since the Application will stand or fall with the Challenge, it is plainly correct that the two applications be listed and or determined together. We have therefore requested of the Court that the Application be issued but not listed or referred to a Judge, pending agreement between the parties (or otherwise by the direction of the Court) that the two applications be heard and or determined together.

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The logo for Mishcon de Reya, featuring the firm's name in a serif font on a solid orange rectangular background.

Please therefore confirm by **close of business on 30 May 2019** whether your client agrees that the Application and Challenge are to be listed to be heard and or determined together. In the event that such consent is not forthcoming, we will invite the Court to provide further direction.

Yours faithfully

A handwritten signature in black ink that reads "Mishcon de Reya LLP".

Mishcon de Reya LLP

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